

## NEW YORK STATE BANKING DEPARTMENT

CONSUMER SERVICES DIVISION

One State Street New York, NY 10004

## **PUBLIC SUMMARY**

# COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Date of Evaluation: December 31, 2008

**Institution**: NewBank

146-01 Northern Boulevard Flushing, New York 11354

Note: This evaluation is not an assessment of the financial condition of this institution. The rating assigned does not represent an analysis, conclusion or opinion of the

New York State Banking Department concerning the safety and soundness of this financial institution.

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#### **GENERAL INFORMATION**

This document is an evaluation of the Community Reinvestment Act ("CRA") performance of NewBank (NB") prepared by the New York State Banking Department. The evaluation represents the Banking Department's current assessment and rating of the institution's CRA performance based on an evaluation conducted as of December 31, 2008.

Section 28-b of the New York State Banking Law, as amended, requires that when evaluating certain applications, the Superintendent of Banks shall assess a banking institution's record of helping to meet the credit needs of its entire community, including low- and moderate-income ("LMI") areas, consistent with safe and sound operations.

Part 76 of the General Regulations of the Banking Board implements Section 28-b and further requires that the Banking Department assess the CRA performance records of regulated financial institutions. Part 76 establishes the framework and criteria by which the Department will evaluate the performance. Section 76.5 further provides that the Banking Department will prepare a written report summarizing the results of such assessment and will assign to each institution a numerical CRA rating based on a 1 to 4 scoring system. The numerical scores represent an assessment of CRA performance as follows:

- (1) outstanding record of meeting community credit needs;
- (2) satisfactory record of meeting community credit needs;
- (3) needs to improve record of meeting community credit needs; and
- (4) substantial noncompliance in meeting community credit needs.

Section 76.5 further requires that the CRA rating and the written summary be made available to the public ("Evaluation"). Evaluations of small banking institutions are primarily based on a review of performance tests and standards described in Section 76.7 and detailed in Section 76.12. The tests and standards incorporate the 12 assessment factors contained in Section 28-b of the New York State Banking Law.

For an explanation of technical terms used in this report, please consult the **GLOSSARY** at the back of this document.

## **OVERVIEW OF INSTITUTION'S PERFORMANCE**

NB's performance was evaluated according to the small bank performance criteria. NB is rated "2," indicating a "**Satisfactory**" record of helping to meet community credit needs. This is the first New York State CRA examination of NB. This rating is based on the following factors:

## Loan-to-Deposit (LTD") Ratio and Other Lending-Related Activities: "Satisfactory"

NB's LTD ratio is reasonable considering its size, financial condition and the credit needs of the assessment area. During the assessment period, NB had an average LTD ratio of 74.9% compared to NB's peers, which had an average LTD ratio of 91.3% NB began the evaluation period as a de novo institution with an LTD ratio of 47.1%. Over the course of the evaluation period, this ratio steadily increased. NB ended the period with an LTD of 91.0%.

## Assessment Area Concentration: "Satisfactory"

For all three years of the evaluation, in considering both the number and dollar of loan originations, NB extended a majority of its loans inside of its assessment area. The bank extended 66% by number and 61% by dollar volume of its business loans in the assessment area.

## • Distribution by Borrowers Characteristics: "Outstanding"

The distribution of small business lending based on borrower characteristics reflected an excellent lending penetration rate among businesses of different sizes. For all three years, based on number and dollar volume of loans, more than 75% of NB's loans were made to businesses with revenues of < = \$1MM. This was more than double the aggregate's lending penetration rate and also exceeded the business demographics. In addition, many of these loans were made to start-up businesses, a community credit need.

## • Geographic Distribution of Loans: "Satisfactory"

The bank's geographic distribution of loans reflected a reasonable lending penetration rate among census tracts of different income levels. In 2006, the smallest year by volume of lending, NB's lending penetration rate in LMI census tracts exceeded the aggregate's penetration rate and the business demographics. However, as volume of lending grew, the penetration rate in LMI census tracts decreased. In 2007, NB's lending penetration rate decreased and was comparable to the aggregate's penetration rate. In 2008, NB's lending penetration rate decreased still further.

## • Action Taken in Response to Written Complaints With Respect to CRA: "Satisfactory"

Neither the bank nor the New York State Banking Department has received any written complaints regarding the bank's CRA performance.

This evaluation was conducted based on a review of the 12 assessment factors set forth in Section 28-b of the New York State Banking Law and Part 76 of the General Regulations of the Banking Board.

## **PERFORMANCE CONTEXT**

#### Institution's Profile:

NB is a commercial bank chartered by New York State in June 2006, with headquarters in Flushing, New York. NB is a member of the Federal Deposit Insurance Corporation ("FDIC"). NB commenced operations on September 29, 2006 providing lending and deposit services to both individuals and businesses.

According to NB's call report dated December, 31, 2008, as submitted to the FDIC, NB reported total assets of \$90.1 million, with \$70.2 million in net loans and total deposits of \$77 million. According to the latest available comparative deposit data (June 30, 2008), NB obtained a market share of .01% or \$61.8 million out of \$600 billion inside its market, ranking it 115<sup>th</sup> among 141deposit –taking institutions in its assessment area.

The following is a summary of the bank's lending portfolio, based on Schedule RC-C of NB's December 31, 2006, December 31, 2007, and December 31, 2008 Call Reports:

TOTAL GROSS LOANS OUTSTANDING									
	12/31/2	2006	12/31/	2007	12/31/2	2008			
LOAN TYPE	\$000	%	\$000	%	\$000	%			
1-4 Residential Mortgage Loans	385	8.2		0.0		0.0			
Commercial & Industrial Loans	3,462	73.8	25,333	71.4	38,242	53.8			
Commercial Real Estate	845	18.0	9,950	28.0	32,492	45.7			
Consumer Loans		0.0	194	0.5	80	0.1			
Other Loans		0.0	22	0.1	207	0.3			
Total Gross Loans	4,692	100.0	35,499	100.0	71,021	100.0			

NB's loan portfolio consists primarily of commercial and industrial loans (53.8%) followed by commercial real estate loans (45.7%). NB services small- to medium-sized businesses with its commercial loan products.

NB operates one banking office located in Queens County. Supplementing this banking office is an Automated-Teller-Machine ("ATM"). During the first quarter of 2009, NB opened a branch in New Jersey to serve the business community there.

NB offers various deposit and loan products. In addition, NB provides internet banking, e-Deposit Service, mobile banking, money transfer services, and safe deposit boxes. NB is designated as a Minority Depository Institution (MDI), which serves predominantly minority communities. The branch is located in a community which is predominantly Asian-American.

NB is an approved U.S. Small Business Administration ("SBA") lender, and received a bronze medal award in 2008, and a gold award in 2009 for excellence in providing capital to small businesses using the SBA's lending program. NB sells its SBA-guaranteed loans in the secondary market ensuring that the institution's capital is working effectively, while

retaining the servicing function which generates income.

This is the first New York State CRA examination of NB. In August 2008, NB received a rating of "2" from the FDIC, indicating a "Satisfactory" record of helping to meet community credit needs.

There are no known financial or legal impediments that adversely impacted NB's ability to meet the credit needs of its community.

#### Assessment Area:

NB's assessment area is comprised of the Bronx, Queens, Kings, Nassau, New York, Richmond and Westchester counties.

There are 2,715 census tracts in the area, of which 332 are low-income, 654 are moderate-income, 880 are middle-income, 779 are upper-income and 70 are zero-income tracts.

Distribution of Assessment Area Census Tracts by Income Level										
County	Zero	Low	Moderate	Middle	Upper	Total	LMI %			
Bronx	14	132	98	65	46	355	64.8			
Kings	15	119	297	235	117	783	53.13			
New York	9	60	59	24	144	296	40.20			
Queens	18	12	148	310	185	673	23.77			
Richmond	2	3	11	29	65	110	12.73			
Nassau	8	2	20	178	69	277	7.94			
Westchester	4	4	21	39	153	221	11.31			
Total	70	332	654	880	779	2715	36.32			

The assessment area appears reasonable based upon the location of NB's office, and its lending patterns. There is no evidence that LMI areas have been arbitrarily excluded.

## **Demographic & Economic Data:**

The total population for the assessment area is 10.3 million. Thirty-nine percent of the families are considered low- and moderate-income. The median family income is \$52,191. The HUD Updated Income for the assessment area is \$66,479. The annual unemployment rates derived from the Bureau of Labor Statistics of the U.S. Department of Labor showed that Bronx and Kings Counties have the highest unemployment rates.

Area	2006	2007	2008
New York State	4.6%	4.5%	5.4%
Bronx County	6.6%	6.6%	7.4%
Kings County	5.3%	5.3%	5.9%
New York County	4.3%	4.2%	4.9%
Queens County	4.5%	4.4%	4.9%
Richmond County	4.5%	4.4%	5.0%
Nassau County	3.8%	3.7%	4.7%
Westchester County	3.9%	3.8%	4.8%

In 2008, there were approximately 876,196 non-farm businesses in the assessment area. Sixty-eight percent of businesses report revenues of less than or equal to \$1 million; 6% report revenues of more than \$1 million, and an additional 26% do not report revenues. More than 30% of the businesses are in the service industries.

## PERFORMANCE STANDARDS AND ASSESSMENT FACTORS

NB's performance was evaluated according to the small bank performance criteria, which include the following: (1) Loan-to-Deposit Ratio and other Lending-Related Activities; (2) Assessment Area Concentration; (3) Distribution by Borrower Characteristics; (4) Geographic Distribution of Loans; and (5) Action Taken in Response to Written Complaints Regarding CRA. The following factors were also considered in assessing the Bank's record of performance: the extent of participation by the board of directors or board of trustees in formulating CRA polices and reviewing CRA performance; any practices intended to discourage credit applications, evidence of prohibited discriminatory or other illegal credit practices; record of opening and closing offices and providing services at offices; and process factors such as activities to ascertain credit needs and the extent of marketing and special credit related programs. Finally, the evaluation considered other factors as delineated in Section 28-b of the Banking Law that reasonably bear upon the extent to which a banking institution is helping to meet the credit needs of its entire community.

The assessment period includes calendar years 2006, 2007, and 2008. Examiners considered small business loans in evaluating factors (2), (3) and (4), as noted above. Small business loan aggregate data are shown for comparative purposes. NB is not required to report small business loan originations; as such, NB is not included in the aggregate data.

Statistics employed in this evaluation were derived from various sources. In addition to bank-specific loan information submitted by NB, aggregate data for small businesses were obtained from the Federal Financial Institutions Examination Council ("FFIEC"). The demographic data referred to in this report were obtained from the 2000 U.S. Census data, with updated median family income figures provided by the U.S. Department of Housing and Urban Development ("HUD"). Business demographic data used in this report derive from information on U.S. businesses, enhanced by Dun & Bradstreet and updated annually. As NB does not make farm loans, the data only include non-farm loans.

This is the first CRA examination conducted by New York State.

Overall CRA Rating: "Satisfactory"

## • Loan-to-Deposit Ratio ("LTD") Analysis: "Satisfactory"

NB's LTD ratio is reasonable considering its size, financial condition and the credit needs of the assessment area. During the assessment period, NB had an average LTD ratio of 74.9% compared to NB's peers, which had an average LTD ratio of 91.3% NB began the evaluation period as a de novo institution with a LTD ratio of 47.1%. Over the course of the evaluation period, this ratio steadily increased. NB ended the period with an LTD of 91.0%, comparable to the peer group.

	Loan-to-Deposit Ratios										
	2006 (Q4)	2007 (Q1)	2007 (Q2)	2007 (Q3)	2007 (Q4)	2008 (Q1)	2008 (Q2)	2008 (Q3)	2008 (Q4)	Average* LTD	
Bank	47.1	71.1	73.2	73.6	76.7	72.2	81.5	88.0	91.0	74.9	
Peer	82.5	85.9	88.2	87.8	93.4	95.0	97.5	96.5	95.3	91.3	

These ratios were calculated from information shown in the bank's Uniform Bank Performance Report ("UBPR") prepared by the FDIC.

## • Assessment Area Concentration: "Satisfactory"

For all three years of the evaluation, in considering both the number and dollar of loan originations, NB extended a majority of its loans inside of its assessment area. The bank extended 66% by number and 61% by dollar volume of its business loans in the assessment area.

Distribution of Loans Inside and Outside the Assessment Area										
Loan Type		Nur	nber of	Loans		Loai	ns in C	Oollars (in	thous	ands)
	Insi	de	Outside T		Total	Inside		Outside		Total
	#	%	#	%		\$	%	\$	%	
Small Business										
2006	17	68	8	32	25	3,045	61	1,962	39	5,007
2007	83	61	54	39	137	26,665	52	24,169	48	50,834
2008	128	71	53	29	181	48,735	67	24,082	33	72,817
Total	228	66	115	34	343	78,445	61	50,213	39	128,658

## • Distribution by Borrower Characteristics: "Outstanding"

The distribution of small business lending based on borrower characteristics reflected an excellent lending penetration rate among businesses of different sizes. For all three years, based on number and dollar volume of loans, more than 75% of NB's loans were made to businesses with revenues of < = \$1MM. This was more than double the aggregate's lending penetration rate and also exceeded the business demographics. In addition, many of these loans were made to start-up businesses, a community credit need.

The following chart provides a summary of NB's small business lending distribution during

the evaluation period, including a comparison to the aggregate's record and the presence of businesses located in the assessment area:

Distribution of Small Business Loans by Revenue Size										
2006										
									Business	
		Ва	ınk			Agg	regate		Demographics	
Revenues	#	%	\$000	%	#	%	\$000	%	%	
<= \$1 MM	14	82.4	2,495	81.9	160,310	29.5	3,866,603	40.7	66.2	
>\$1 MM	3	17.6	550	18.1					33.8	
Total	17	100.00	3,045	100.0	543,977	100.0	9,506,339	100.0		
	2007									
		Ва	nk		Aggregate					
Revenues	#	%	\$000	%	#	%	\$000	%		
<= \$1 MM	73	88.0	24,095	90.4	177,392	31.0	4,215,380	38.8	68.7	
>\$1 MM	10	12.0	2,570	9.6					31.3	
Total	83	100.0	26,665	100.0	571,974	100.0	10,852,605	100.0		
					2008					
Revenues		Ba	nk		Aggregate					
	#	%	\$000	%						
<= \$1 MM	114	89.1	44,085	90.5					67.4	
>\$1 MM	14	10.9	4,650	9.5		32.6				
Total	128	100.0	48,735	100.0	Not Available 32.6					

## **Geographic Distribution of Loans: "Satisfactory"**

The bank's geographic distribution of loans reflected a reasonable lending penetration rate among census tracts of different income levels.

In 2006, the smallest year by volume of lending, NB's lending penetration rate in LMI census tracts exceeded the aggregate's penetration rate and the business demographics. However, as volume of lending grew, the penetration rate in LMI census tracts decreased. In 2007, NB's lending penetration rate decreased and was comparable to the aggregate's penetration rate. In 2008, NB's lending penetration rate decreased still further. Aggregate data were not available for comparison.

The following chart provides a summary of the NB's small business lending distribution during the evaluation period:

	Distribution of Small Business Loans by Geographic Income Level								
					2006				
									Business
Geography		В	ank			Agg	gregate		Demographics
Income Level	#	%	\$000	%	#	%	\$000	%	%
Low	2	11.8	800	26.3	24,098	4.4	486,226	5.1	6.7
Moderate	4	23.5	835	27.4	79,583	14.6	1,414,480	14.9	17.3
Middle	5	29.4	600	19.7	162,778	29.9	2,698,104	28.4	28.4
Upper	6	35.3	810	26.6	273,697	50.3	4,790,069	50.4	46.7
NA	0	0.0	0	0.0	3,821	0.7	117,460	1.2	0.9
Total	17	100.0	3,045	100.0	543,977	100.0	9,506,339	100.0	100.0
					2007				
Geography		В	ank			Agg	gregate		
Income Level	#	%	\$000	%	#	%	\$000	%	%
Low	6	7.2	4,060	15.2	27,200	4.8	516,188	4.8	6.8
Moderate	11	13.3	1,515	5.7	88,904	15.5	1,582,786	14.6	17.4
Middle	32	38.6	8,825	33.1	173,954	30.4	3,072,966	28.3	28.4
Upper	33	39.8	11,915	44.7	278,148	48.6	5,536,402	51.0	46.5
NA	1	1.2	350	1.3	3,768	0.7	144,263	1.3	0.9
Total	83	100.0	26,665	100.0	571,974	100.0	10,852,605	100.0	100.0
					2008				
Geography		В	ank			Agg	gregate		
Income Level	#	%	\$000	%	#	%	\$000	%	%
Low	5	3.9%	2,880	5.9					7.0
Moderate	15	11.7%	3,591	7.4	ailable				17.8
Middle	56	43.8%	23,207	47.6					28.3
Upper	52	40.6%	19,057	39.1		La Da	tals		45.9
NA					A agres	Jake -			1.0
Total	128	100.0%	48,735	100.0	100.0				

## Action Taken In Response to Written Complaints With Respect to CRA: Satisfactory

Neither NB nor the New York State Banking Department has received any written complaints regarding the bank's CRA performance.

#### Additional factors:

The extent of participation by the banking institution's board of directors/trustees in formulating the banking institution's policies and reviewing its performance with respect to the purposes of the Community Reinvestment Act.

The board of directors oversees and monitors NB's CRA performance semi-annually, and approves the periodic CRA Self Assessment Summary, and CRA Plan.

Any practices intended to discourage applications for types of credit set forth in the banking institution's CRA Public File.

Examiners noted no practices that were intended to discourage applications for the types of credit offered by the institution.

## Evidence of prohibited discriminatory or other illegal credit practices.

The most recent New York State Banking Department regulatory compliance and fair lending examinations were completed as of November 2008, with satisfactory adherence to anti-discrimination and other applicable laws and regulations.

## The banking institution's record of opening and closing offices and providing services at offices.

NB operates one banking office located in Flushing, New York. Supplementing this banking office is an Automated-Teller-Machine ("ATM).

#### **Process Factors**

Activities conducted by the banking institution to ascertain the credit needs of its community, including the extent of the banking institution's efforts to communicate with members of its community regarding the credit services being provided by the banking institution.

NB through its officers, employees and board of directors maintains ongoing contact with business and civic leaders in the community it serves, in order to ascertain their credit needs. In particular, a branch manager is a member of the board of directors of a women's homeless shelter and bank staff attends the shelter's fundraising event.

The extent of the banking institution's marketing and special credit-related programs to make members of the community aware of the credit services offered by the banking institution.

During the examination period, NB introduced its products and services to the community through advertising in a local newspaper. During the examination period NB also introduced its banking services on The Korean Channel, a cable TV channel.

#### **Other Factors**

Other factors that in the judgment of the Superintendent and Banking Board bear upon the extent to which a banking institution is helping to meet the credit needs of its entire community.

NB has supported the YWCA of Queens in Flushing.

## **GLOSSARY**

## **Aggregate Penetration Rate**

The number of loans originated and purchased by all reporting lenders in specified categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the assessment area.

## **Community Development**

The term "community development" is defined to mean:

- 1. Affordable housing (including multifamily housing) for low- or moderate-income ("LMI") individuals:
- 2. Community services targeted to LMI individuals;
- 3. Activities that promote economic development by financing business or farms that meet the size eligibility standards of the United States Small Business Administration ("SBA") Development Company or Small Business Investment Company programs, or have gross annual incomes of \$1 million or less;
- 4. Activities that revitalize or stabilize LMI geographies; and
- 5. Activities that seek to prevent defaults and/or foreclosures in loans included in (1) and (3) above.

A "community development loan" is defined as a loan that has as its *primary purpose* community development. This includes but is not limited to loans to:

- Borrowers for affordable housing rehabilitation and construction, including construction and permanent financing for multifamily rental property serving low or moderate income ("LMI") persons;
- Nonprofit organizations serving primarily LMI or other community development needs;
- Borrowers to construct or rehabilitate community facilities that are located in LMI areas or that primarily serve LMI individuals;
- Financial intermediaries including community development financial institutions, community development corporations, minority- and women-owned financial institutions, community loan funds or pools, micro-finance institutions, and lowincome or community development credit unions that primarily lend or facilitate lending to promote community development;
- Local, state and tribal governments for community development activities; and
- Borrowers to finance environmental clean up or redevelopment of an industrial site as part of an effort to revitalize the LMI community in which the property is located.

A "qualified investment" is defined as a lawful investment, deposit, membership share or grant that has as its *primary purpose* community development. This includes but is not limited to investments, deposits, membership shares or grants in or to:

- Financial intermediaries (including community development financial institutions, community development corporations, minority- and women-owned financial institutions, community loan funds, micro-finance institutions and low-income or community development credit unions) that primarily lend or facilitate lending in LMI areas or to LMI individuals in order to promote community development;
- Organizations engaged in affordable housing rehabilitation and construction;
- Organizations, including, for example, small business investment corporations that promote economic development by financing small businesses;
- Facilities that promote community development in LMI areas or LMI individuals, such as youth programs, homeless centers, soup kitchens, health care facilities, battered women's centers, and alcohol and drug recovery centers;
- Projects eligible for low-income housing tax credits;
- State and municipal obligations, such as revenue bonds that specifically support affordable housing or other community development needs;
- Organizations serving LMI housing or other community development needs, such as counseling for credit, home ownership, home maintenance, and other financial services education; and
- Organizations supporting activities essential to the capacity of LMI individuals or geographies to utilize credit to sustain economic development, such as day care operations and job training programs that facilitate access to permanent jobs.

A "community development service" is defined as a service that has as its *primary purpose* community development, is related to the provision of financial services, and has not been considered in the evaluation of the banking institution's retail banking services. This includes but is not limited to:

- Providing technical assistance on financial matters to nonprofit, tribal or government organizations serving LMI housing or economic revitalization and development needs:
- Providing technical assistance on financial matters to small businesses or community development organizations;
- Lending employees to provide financial services for organizations facilitating affordable housing construction and rehabilitation or development of affordable housing:
- Providing credit counseling, home buyers and home maintenance counseling, financial planning or other financial services education to promote community development and affordable housing;
- Establishing school savings programs for LMI individuals;
- Providing seminars for LMI persons on banking and bank account record-keeping;
- Making ATM "Training Machines" available for extended periods at LMI community sites or at community facilities that serve LMI individuals; and
- Technical assistance activities to community development organizations such as:
  - Serving on a loan review committee;
  - Developing loan application and underwriting standards;
  - Developing loan processing systems;

- Developing secondary market vehicles or programs;
- Assisting in marketing financial services, including the development of advertising and promotions, publications, workshops and conferences;
- Furnishing financial services training for staff and management;
- Contributing accounting/bookkeeping services; and
- ❖ Assisting in fund raising, including soliciting or arranging investments.

## **Home Mortgage Disclosure Act ("HMDA")**

The Home Mortgage Disclosure Act, enacted by Congress in 1975, and subsequently amended, requires institutions to annually report data about applications for residential (including multifamily) financing.

#### **Income Level**

The income level of the person, family or household is based on the income of person, family or household. A geography's income is categorized by median family income for the geography. In both cases, the income is compared to the MSA or statewide nonmetropolitan median income.

Income level of individual or geography	% of the area median income
Low-income	Less than 50
Moderate-income	At least 50 and less than 80
Middle-income	At least 80 and less than 120
Upper-income	120 or more

#### **Loans to Small Businesses**

Small business loans to businesses with gross annual revenues ("GAR") of \$1 million or less ("< = \$1MM").

### Low or Moderate Income ("LMI") Geographies

Those census tracts or block numbering areas ("BNAs"), where according to the 2000 US Census, the median family income is less than 80% of the area median family income. In the case of tracted areas that are part of a Metropolitan Statistical Area ("MSA") or Primary Metropolitan Statistical Area ("PMSA"), this would relate to the median family income for the MSA or PMSA in which the tracts are located. In the case of BNAs and tracted areas that are not part of a MSA or PMSA, the area median family income would be the statewide non-metropolitan median family income.

#### **LMI Borrowers**

Borrowers whose income, as reported on the loan application which the lender relied upon in making the credit decision, is less than 80% of the area median family income. In the case where the residential property is located in a MSA or PMSA, this would

relate to the median family income for that MSA or PMSA. Otherwise, the area median family income would be the statewide non-metropolitan median family income. In all instances, the area median family incomes used to measure borrower income levels are updated annually by the U.S. Department of Housing and Urban Development ("HUD").

## **LMI Individuals/Persons**

Individuals or persons whose income is less than 80% of the area median family income. In the case where the individual resides in a MSA or PMSA, this would relate to the median family income for that MSA or PMSA. Otherwise, the area median family income would be the statewide non-metropolitan median family income. In all instances, the area median family incomes used to measure individual income levels are updated annually by HUD.

## **LMI Penetration Rate**

A number that depicts the percentage of a bank's total loans (for a particular product) that was extended to LMI geographies or borrowers. For example, an LMI penetration rate of 20% would indicate that the bank made 20 out of a total of 100 loans in LMI geographies or to LMI borrowers.

### **Small Business Loans**

Loans to businesses with original amounts of < = \$1MM.